

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No:	15-34090
Michael Losito)	Chapter:	Chapter 13
Cathy Marie Losito)	Judge:	Jacqueline P. Cox
Debtors,)		
)		

NOTICE OF MOTION

To: Michael Losito, 6156 Forestview Dr, Oak Forest, IL, 60452

Tom Vaughn, 55 E. Monroe St # 3850, Chicago, IL, 60603

OneMain Financial Group, LLC as service for Wells, 6801 Colwell Blvd., Mail Stop: NTSB: 1310, Irving, TX 75039

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

PLEASE TAKE NOTICE that on the **March 6, 2017 at 9:00 a.m.**, I shall appear before the Honorable Judge Jacqueline P. Cox in 219 S. Dearborn St., Courtroom 680, Chicago, IL and then and there present the attached **MOTION TO AUTHORIZE RETENTION OF FUNDS**, a copy of which is attached hereto.

By: /s/ Kyle Dallmann
Kyle Dallmann

CERTIFICATE OF SERVICE

I, Kyle Dallmann, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, at 55 E. Monroe, Chicago, Illinois, before the hour of 5:30 p.m., on February 27, 2017.

By: /s/ Kyle Dallmann
Kyle Dallmann

Attorneys for the Debtors

Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800 (Fax): 877.247.1960

AMC Mortgage Services Attn: Bankruptcy Dept. Po Box 11000 Santa Ana CA 92711	Citibank N.A. C/O Portfolio Recovery ASS 120 Corporate Blvd Ste 1 Norfolk VA 23502
Atlantic Credit & Finance, Inc Bankruptcy Dept. PO Box 13386 Roanoke VA 24033	Clerk, Fifth Mun. Div. Bankruptcy Dept. 10220 S. 76th Ave., #121 Bridgeview IL 60455
Clerk, Fifth Mun. Div. Bankruptcy Dept. 10220 S. 76th Ave., #121 Bridgeview IL 60455	Blatt, Hasenmiller, Leibske Bankruptcy Dept. 10 S. LaSalle St. Ste 2200 Chicago IL 60603
Blitt and Gaines, PC Bankruptcy Dept. 661 Glenn Ave. Wheeling IL 60090	DELBERT SERVICES/Consu Attn: Bankruptcy Dept. Rodney Square N 1100 N M Wilmington DE 18901
Atlantic Credit & Finance, Inc Bankruptcy Dept. PO Box 13386 Roanoke VA 24033	GMAC Mortgage Attn: Bankruptcy Dept. Po Box 4622 Waterloo IA 50704
Nations Recovery Center, Inc. Bankruptcy Dept. 6491 Peachtree Industrial Blvd Atlanta GA 30360	Onemain Attn: Bankruptcy Dept. Po Box 499 Hanover MD 21076
Capital ONE BANK USA N.A. C/O Portfolio Recovery ASS 120 Corporate Blvd Ste 1 Norfolk VA 23502	PennyMac Loan Services Bankruptcy Dept PO Box 514387 Los Angeles CA 90051
Cash Net USA Bankruptcy Dept. PO Box 643990 Cincinnati OH 46264	Rise Credit Bankruptcy Dept. PO Box 101808 Fort Worth TX 76185
Cashcall INC Attn: Bankruptcy Dept. 1 City Blvd W Orange CA 92868	Silver Cloud Financial, Inc Bankruptcy Dept. 635 East Hwy 20, C Upper Lake CA 95485
Chase CARD Attn: Bankruptcy Dept. Po Box 15298 Wilmington DE 19850	US DEPT OF ED/Gleisi Attn: Bankruptcy Dept. Po Box 7860 Madison WI 53707
CITI Attn: Bankruptcy Dept. Po Box 6241 Sioux Falls SD 57117	WF CRD SVC Attn: Bankruptcy Dept. 3201 N 4Th Ave Sioux Falls SD 57104

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MOTION TO AUTHORIZE RETENTION OF FUNDS

NOW COME the Debtors, Mr. & Mrs. Michael Losito (the "Debtors"), by and through their attorneys, Geraci Law LLC, to present their **MOTION TO AUTHORIZE RETENTION OF FUNDS**, and state as follows:

1. This Court has jurisdiction pursuant to 11 U.S.C. 1334 and this is a "core proceeding" under 28 U.S.C. 157(b).
2. The Debtors filed a petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code and a plan of reorganization on 10/06/2015.
3. On 12/21/2015, the Court confirmed the Chapter 13 plan.
4. The Debtors' 2001 Dodge Ram was totaled in an accident.
5. The insurance proceeds for the totaled vehicle exceed the balance of the car note by \$2,245.38.
6. The Debtors seek to use these funds to purchase a replacement vehicle so that they can avoid a lengthy financing agreement.

WHEREFORE, the Debtors, Mr. & Mrs. Michael Losito, pray that this Court enter an order authorizing the Debtors to retain the funds and for such further additional relief that this Court may deem just and proper.

/s/ Kyle Dallmann
Kyle Dallmann

Attorneys for the Debtors

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Chicago, Illinois 60603
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